



Chairman Kevin Martin
Commissioner Jonathan S. Adelstein
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Deborah Taylor Tate
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554-0005

**Re: Ex Parte Comments of PSAV Presentation Services , ET Docket No. 04-186
Introduction of Unlicensed "White Spaces" Devices**

Dear Chairman Martin and Commissioners Adelstein, Copps, McDowell, and Tate,

On behalf of our over 3000 employees working at over 600 hotels, resorts and conference centers across the United States, PSAV Presentation Services ("Presentation Services") strongly urges the Commission *not* to authorize at its upcoming meeting unlicensed wireless devices -- in particular those that rely on novel and unproven spectrum sensing technology -- to operate on frequencies currently being used by professional audio equipment including wireless microphone systems. This step is not justified by the technical record in this proceeding and would put at serious risk business and other conference events across the Nation that rely on wireless microphone systems. Eliminating those wireless systems will be a step backwards for corporate America.

Presentation Services is the leading audiovisual company in the industry, with extensive off-site staging, meeting and rental resources. Our reputation as a leader in the industry is built on decades of providing the highest quality audio and visual services that make possible the many successful trade shows, business conventions, and conferences that are fundamental to the Nation's business economy. Millions of people, and enterprises small and large, rely on these business gatherings. Over the years, the audio and visual production aspect of these gatherings have become more complex with the largest gatherings, such as significant stockholder meetings and new product launches, rivaling any broadcast or theater production. Professional audio and visual production has also greatly expanded over the years. It is no exaggeration to say that virtually every convention center, conference hall, and meeting center in America will suffer if unlicensed wireless equipment interferes with wireless microphone systems. The government should be supporting our efforts not throwing roadblocks in our way as the American business sector navigates through difficult financial times.

We are very concerned that the Commission is poised to adopt radical changes to the wireless frequency rules that will severely impair wireless microphone systems. We believe that the Commission's tests of the spectrum sensing technology that is proposed to prevent interference to wireless microphones have not been properly vetted and, in fact, do not justify

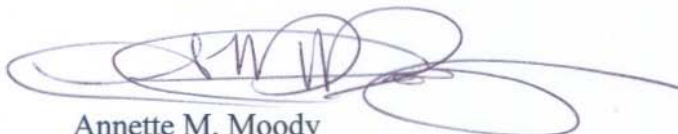
government approval of a rule change at this time. In that regard, we strongly urge the Commission to allow for public comment and analysis, as well as an independent technical peer review, of its test report.

It is not reasonable for the Commission to approve interfering technology now based on the supposition that spectrum sensing can be made to work later. Authorizing new uses of the frequencies by technologies that have not proven to provide effective interference protection will result in significant lost investment and unacceptable limitations on existing businesses. Given the current financial turmoil, the Commission should not be focused on imposing additional costs and burdens on strong, growing businesses that employ thousands of Americans. We are also acutely aware that the Commission has proposed in WT Docket No. 08-166 to prohibit in a just a few short months audio systems operating in the 700 MHz band which makes the Commission's treatment of the frequencies in core TV bands all the more crucial as businesses like Presentation Services will be forced to look for other frequencies to support their audio needs.

Instead, if the Commission is determined to proceed with a change in the uses of the core TV band frequencies, it should do so only with great caution given the significant risks to many operating businesses. We believe it imperative to identify an adequate number of protected channels in each market that wireless microphones could operate on free from white space device interference. These protected channels are necessary to support the significant daily use of smaller numbers of wireless microphone channels that requires flexibility that make up the majority of our daily meeting events. We would also recommend that the FCC consider making these protected channels available in the frequencies that already are being used by wireless microphones, so that our industry is not under the additional burden of replacing all current inventory.

We appreciate your consideration of this letter.

Sincerely,

A handwritten signature in purple ink, appearing to read 'AMM', with a large, loopy flourish extending to the right.

Annette M. Moody
SVP, Product Management
PSAV, Presentation Services